

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRIAN KELSEY and  
JOSHUA SMITH,

Defendants.

No. 3:21-cr-00264

---

**MOTION FOR LEAVE TO APPEAR REMOTELY**

---

Undersigned counsel for Defendant Brian Kelsey, David A. Warrington, hereby requests leave to appear remotely, by telephone or videoconference, at the Court's scheduled status conference set for 9 a.m. on July 27, 2023. In support thereof, counsel has other pending matters that would make travel to Nashville for the status conference difficult. To wit: a previously scheduled matter in Fairfax, Virginia on Wednesday, July 26, 2023, in the case of *Mountjoy v. Slaey*, Case No. 2021-7508, pending in the Circuit Court for Fairfax County that may last the full day, making travel to Nashville difficult. Additionally, counsel has pending commitments for witness and expert preparation, filings, and travel to New York for a multi-day preliminary injunction hearing set for August 1-2 in the United States District Court for the Eastern District of New York in the matter *United States v. Rare Breed Triggers, LLC, et al.*, Case No. 1:23-cv-00369.

Wherefore, undersigned counsel, David A. Warrington, hereby respectfully requests leave to appear remotely, by telephone or videoconference at the Court's preference, for the

presently set status conference at 9 a.m. on July 27, 2023.

Respectfully submitted,

s/ David A. Warrington

David A. Warrington, *pro hac vice*

Dhillon Law Group, Inc.

2121 Eisenhower Avenue, Suite 608

Alexandria, VA 22314

Telephone: 415-520-6593

DWarrington@dhillonlaw.com

*Counsel for Defendant Brian Kelsey*

## CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been electronically delivered via the Court's electronic filing system on this the 20th day of July 2023 to:

Hal Hardin  
Hal D. Hardin  
211 Union Street, Suite 200  
Nashville, TN 37201

Phillip Georges  
Phillip S. Georges, PLLC  
501 Union St., Ste. 200d  
Nashville, TN 37219

Amanda Klopff  
Assistant United States Attorney  
110 Ninth Avenue, South, Suite A961  
Nashville, TN 37203-3870

David Pritchard  
Assistant United States Attorney  
167 North Main Street, Suite 800  
Memphis, TN 38103

John P. Taddei  
U.S. Department of Justice  
1301 New York Ave. NW  
Washington, DC 20530

J. Alex Little  
Zachary C. Lawson  
Burr & Forman LLP  
222 Second Avenue South, Suite 2000  
Nashville, TN 37201

Paul J. Bruno  
David A. Rivera  
Jerry E. Martin  
Barrett, Johnston, Martin & Garrison, LLC  
414 Union Street, Suite 900  
Nashville, TN 37219

s/ David A. Warrington  
David A. Warrington